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Counsel for debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

GUILLERMO J ROMERO

DEBTOR.

Chapter 13

Case No. **Case No.: 19-22316**

Honorable Michael B. Kaplan

Hearing Date Scheduled: 11/5/19

DEBTORS RESPONSE TO TRUSTEE OBJECTION

Debtors Counsel response to Creditors Objection to Confirm Plan by Franklin S. Montero.

- 1) Trustee on 10/04/19 files Objection to Debtors request to vacate dismissal.
- 2) Trustee Objected to various requests that need completed.
- 3) Since the filed Objection, Counsel has made necessary changes as requested and provided all Requested documentation needed.
- 4) Debtor has been making Chapter 13 payments to the Trustee and is current.
- 5) Debtor is applying for Loss Mitigation in this case and motion has been filed.
- 6) Debtor is making adequate protection payments directly to the lender during the process of the Loss Mitigation.
- 7) Should the Debtor not qualify for the Loss Mitigation, at such time the Debtor will either file amended schedules and plan accordingly or list the home for sale.

WHEREFORE, response is filed to oppose the Trustee Objection to Chapter 13 Plan Confirmation in the case and for all due and proper relief in the premises.

Date **November 4, 2019**

Signature **/s/ Franklin S. Montero**

Name **Franklin S. Montero**

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